

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10019-JSR

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

**THIRD-PARTY DEFENDANT JAMES STALEY’S LOCAL RULE 56.1 STATEMENT  
OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF SUMMARY JUDGMENT**

**I. PARTIES**

1. James E. “Jes” Staley (Mr. Staley) worked at JPMorgan Chase Bank, N.A. from 1979 to 2013 and held several senior positions in the later part of his tenure.

2. JPMorgan Chase Bank, N.A. (JPMorgan) is a national bank whose main office is located in Columbus, Ohio, as designated in its Articles of Association.

## II. STALEY'S TENURE AT JPMORGAN

3. Mr. Staley became head of JPMorgan's Private Bank in 1999. Ex. 1, at 27:24-28:3.
4. [REDACTED]  
[REDACTED] Ex. 2, at 45:18-47:8; 78:21-79:12.
5. [REDACTED]  
[REDACTED] Ex. 2, at 45:18-50:14;  
248:16-249:1.
6. Mr. Staley did not have a relationship with Epstein before meeting with him in or around 2000. Ex. 2, at 45:18-50:14.
7. Mr. Staley became CEO JPMorgan's Asset and Wealth Management division in 2001. Ex. 2, at 11.
8. Mr. Staley became CEO of JPMorgan's Investment Bank in 2009. Ex. 2, at 11:16-12:6.
9. Mr. Staley ended his employment with JPMorgan in January 2013. Ex. 3.
10. Epstein introduced Mr. Staley [REDACTED] Ex. 2, at 86:19-88:4.
11. Epstein introduced Mr. Staley [REDACTED] Ex. 2, at 86:19-88:13.
12. Epstein introduced Mr. Staley [REDACTED] Ex. 2, at 86:19-87:6.
13. Mr. Staley used his corporate email account to communicate with Epstein. Ex. 2, at 254:4-21, 385:5-12; Ex. 4, at -1998-2019.

### III. RELEVANT POLICIES AND PRACTICES AT JPMORGAN

14. At the relevant times, JPMorgan had policies implementing its Anti-Money Laundering (AML) and Sponsorship Policies known as the Anti-Money Laundering/Know Your Client Policy (KYC). Ex. 5, at -9752; Ex. 6, at -162-163.

15. The policy's principles included that:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 6, at -164.

16. The client sponsorship policy required generally that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 6, at -164-165; Ex. 7, at 57:25-58:10.

17. The due diligence outlined in the policy required that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] Ex. 6, at -164-167; Ex. 8, at 61:9-24; Ex. 9, at-1937; Ex. 10, at 155:20-157:7.

18. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 6, at -0170; Ex. 8, at 79:14-80:2; Ex. 10, at 461:9-16; Ex. 7, at 54:20-23. [REDACTED]  
[REDACTED] Ex. 7, at 54:16-19; Ex. 11, at -570.

19. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Ex. 6, at -164; Ex. 12, at -576; Ex. 13, at -159.

20. JPMorgan had additional policies and procedures for clients who were designated “high risk.” Ex. 11. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
21. [REDACTED]
- [REDACTED]
- [REDACTED] Ex. 6, at -170; Ex. 1, at 88:19-89:19.
22. Risk management and compliance also had account monitoring roles at least for high-risk clients. Ex. 11, at -571; Ex. 14, at -938-939. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Ex. 11, at -571.
23. JPMorgan's policy for identifying and investigating unusual or suspicious activity instructed that [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED] Ex. 9, at -134. [REDACTED]
- [REDACTED]
- [REDACTED] Ex. 9, at -134.

24. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 9, at -138; Ex. 15, at 25:22-26:4; Ex. 10, at 82:19-83:7; 100:1-102:19. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 15, at 27:5-16; Ex. 10, at 99:13-24. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 15, at 257:16-258:16; Ex. 10, at 485:8-486:24. [REDACTED]  
[REDACTED] Ex. 10, at 104:11, 485:8-486:24.
25. Mr. Staley did not have responsibilities to conduct due diligence on any individual private banking clients while he was head of the Private Bank or Asset & Wealth Management, or CEO of the Investment Bank. Ex. 1, at 44:8-47:17.
26. [REDACTED]  
[REDACTED] Ex. 7, at 58:13-24.
27. [REDACTED]  
[REDACTED] Ex. 7, at 16:17-19:25; Ex. 16, at -617-622.
28. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 7, at 18:14-19:13; Ex. 17, 747:14-750:9; Ex. 18, at -722-766; Ex. 19, at -008-011.
29. [REDACTED]  
[REDACTED]

[REDACTED] Ex. 20, at 180:15-24. [REDACTED]

[REDACTED] Ex. 20, at 326:1-330:23.

#### IV. JPMORGAN'S RELATIONSHIP WITH EPSTEIN

30. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 21, at -203; Ex. 22, at 30:24-31:9, 195:8-18; Ex. 71.

31. [REDACTED] Ex. 23.

32. [REDACTED]  
[REDACTED] Ex. 24, at 6:17-8:8.

33. [REDACTED]  
[REDACTED] Ex. 25, at 7:22-25, 56:17-23; Ex. 12, at -577.

34. [REDACTED]  
[REDACTED] Ex. 26, at 11:12-17; Ex. 12, at -577.

35. [REDACTED] Ex.  
26, at 26:17-18.

36. [REDACTED] Ex. 12,  
at -577. [REDACTED]  
Ex. 12, at -577. [REDACTED] Ex.  
12, at -577. [REDACTED]  
[REDACTED] Ex. 12, at -577. [REDACTED]  
[REDACTED] Ex. 12, at -577.

37. [REDACTED]

[REDACTED] Ex. 27, at -977; Ex. 28, at -554-555.

38. [REDACTED]

[REDACTED] Ex. 1, at 157:23-58:13.

39. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 68.

**V. JPMORGAN'S RESPONSE TO DEROGATORY INFORMATION REGARDING EPSTEIN**

40. Epstein was indicted in Florida state court for felony solicitation of prostitution on July 19, 2006. Ex. 30.

41. [REDACTED]

[REDACTED] Ex. 8, at 65:9-66:15; Ex. 31, at -285-288.

42. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 32. [REDACTED]

[REDACTED] Ex. 8, at 65:9-66:10.

43. Mr. Staley did not object to the determination of keeping Epstein solely as a banking client and on a reactive, client service basis. Ex. 8, at 386:5-390:2; Ex. 2, at 123:13-25.



44. Mr. Staley did not object to Epstein's designation as high-risk, nor did he ever ask anyone to change Epstein's high-risk designation. Ex. 1, at 146:16-148:17.

45. [REDACTED]  
[REDACTED] Ex. 33. [REDACTED]  
[REDACTED] Ex. 33.

46. [REDACTED]  
[REDACTED] Ex. 34, at -  
787; Ex. 35; Ex. 36; Ex. 37; Ex. 38, at 133:5-17.

47. [REDACTED]  
[REDACTED] Ex. 37; Ex. 72, at -30-31.

48. [REDACTED]  
[REDACTED] Ex. 39, at -  
305-306; Ex. 40, at -738-742; Ex. 41, at -038-041; Ex. 42, at -661-666; Ex. 43, at -  
816-17; Ex. 44; Ex. 45, at -272-273; Ex. 46, at -30-31; Ex. 47, at -179-180.

49. [REDACTED]  
[REDACTED] Ex.  
48, at -305; Ex. 49, at -761-762; Ex. 50, at -519-520; Ex. 51; Ex. 52, at -651-660; Ex.  
53.

50. Mr. Staley was unaware of Epstein's practice of withdrawing large amounts of cash.  
Ex. 2, at 30:12-31:3.

51. [REDACTED]  
[REDACTED] Ex. 3; Ex. 54, at -688-691.

52. [REDACTED]  
[REDACTED]

Ex. 3; Ex. 55.

## **VI. JPMORGAN INQUIRIES INTO EPSTEIN AND MR. STALEY**

53. In July 2019, Epstein was arrested on a sex-trafficking charge. Ex. 56, at iv.

54. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 57, at  
9:2-11:15.

55. [REDACTED]  
[REDACTED] Ex. 58; Ex.  
4; Ex. 57, at 19:2-11, 38:18-40:1.

56. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Ex. 4,  
at -2000, -2005.

57. [REDACTED]  
[REDACTED] Ex. 61; Ex.  
57, at 41:1-44:25.

58. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 57, at 37:18-38:2, 41:3-45:8; Ex. 61, at -702. [REDACTED]

[REDACTED]  
[REDACTED] Ex. 59; Ex. 60; Ex. 29.

59. [REDACTED]  
[REDACTED] Ex. 58; Ex. 4; Ex. 57,  
at 19:2-11.

60. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 4, at -2005. [REDACTED]  
[REDACTED]  
[REDACTED]  
Ex. 4, at -1998, -2000.

61. [REDACTED]  
[REDACTED] Ex. 12, at -596; Ex. 62, at -903; Ex. 63,  
at -548.

62. [REDACTED]  
[REDACTED] Ex. 64, at -221-223; Ex. 57, at 22:21-23:4.

63. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 64,  
at 221-223.

64. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] Ex. 64, at -221-223.

65. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 64, at 221-223.

66. [REDACTED]  
[REDACTED]  
[REDACTED] Ex. 57, at 8:21-9:15.

67. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Ex. 65, at -725. [REDACTED]  
[REDACTED] Ex. 65, at -725

68. [REDACTED]  
[REDACTED] Ex. 61.

69. [REDACTED]  
[REDACTED] EX. 66, at -580; Ex. 57, at 53:4-54:2.

70. [REDACTED] Ex. 17,  
at 750:10-19; Ex. 7, at 20:17-20.

## **VII. THE CURRENT LITIGATION**

71. JPMorgan did not sue Mr. Staley before 2023. Ex. 67.

72. JPMorgan sued Mr. Staley in 2023, after it was sued by the Government of the U.S. Virgin Islands and the Jane Doe plaintiff. Ex. 67.
73. The bank has identified seven instances starting in “late 2009 or early 2010” in which Mr. Staley allegedly “vouch[ed]” for Epstein’s character and conduct. Ex. 68.
74. The alleged “vouching” lists Mr. Staley telling other bank employees things like “that he knew and trusted Epstein”; that Epstein “had paid his debt to society”; and that Mr. Staley had “a good relationship with him.” Ex. 68.
75. The bank does not contend that Mr. Staley was aware of Jeffrey Epstein’s alleged sex trafficking. Ex. 69.
76. Mr. Staley’s asserted vouching for Epstein did not violate any policy at the bank. Ex. 1, at 112:4-22.
77. The bank originally sought reputational damages, but it has dropped any claim to such damages. Ex. 70, at 8-9.
78. JPMorgan seeks “the amount JPMorgan will pay to the [*Doe* class] to settle this action, in the amount of \$290,000,000.00.” Ex. 70, at 9.

Date: August 25, 2023

Respectfully submitted,

By: /s/ Stephen L. Wohlgemuth

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